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September 27, 2024

Honorable Stephen L. Crocker  
District Court Judge  
U.S. District Court  
Western District of Wisconsin  
120 North Henry Street, Room 320  
Madison, WI 53703

Re: *United States of America v. Steven Anderegg*  
W.D. Case No. 24 cr 50 (jdp)

To the Honorable Steven L. Crocker,

The defense respectfully moves for an order modifying Anderegg's bond conditions to allow him to have telephonic contact with his son. The state has modified its bond to allow for it. The government defers to the probation office and the probation office would need an amended order to allow for this contact.

The Court is very familiar with this case and the conditions of bond that have been set. They are stringent and (as promised) Anderegg has abided by every one of them. It has been seven months since Anderegg has spoken to his son, and his son and wife would like Anderegg to be able to have telephonic contact with his son. At this point, he's presumed innocent and there are many reasons to suggest he'll be successful in this federal case and the underlying state case. Putting those arguments to the side, the Court with the greatest interest in protecting his son has granted this relief, so long as he continues to comply with the federal conditions. That is, Anderegg the ability to have telephonic contact with his son—if this Court also agrees. This is a screenshot of the CCAP order.

HURLEY BURISH, S.C.

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Bail/bond hearing

Levine, Elliott M

Bjerke, Tina

**Additional text:**

2:32 PM Defendant Steven A Anderegg in court. Attorney Jennifer S Lough in court for Steven A Anderegg. Attorney Andrew J. Burdick in court for State of Wisconsin.

Court has reviewed motion to modify bond.

Atty Burdick - State is in compliance w/ victim's rights. Atty Burdick has no objection to bond modification.

CT: Bond amended to allow phone contact w/ def's child as long as def is following federal rules/bond conditions.

The defense would ask that special condition 21 be amended to the following: the defendant shall have no contact with any witnesses and alleged victims, this ban does not include telephonic contact with his son.

To be clear, Anderegg's wife favors this modification. If the Court desires a hearing on this motion to save the government lawyer time and expense of coming here, the defense would respectfully ask that the hearing take place on zoom or telephonically.

Sincerely,

HURLEY BURISH, S.C.

*Electronically signed by Joseph A. Bugni*

Joseph A. Bugni

JAB:mns

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